Assessment of Public Comment for Draft Bobcat Plan

December 2024

DEC received a total of 53 comments from individuals and organizations on the draft "Management Plan for Bobcat in New York State, 2023-2032" during the 45-day public comment period. Organizations that commented included the New York State Trapper's Association, the Adirondack Council, the Humane Society of the United States, and Protect the Adirondacks!, Inc. DEC solicited public comment through a notice in the Environmental Notice Bulletin (ENB) and on the DEC website. The Bureau of Wildlife Furbearer Management Team reviewed all comments received and addressed substantive comments in the revised final plan and below.

Summary of changes to the Plan in response to public comment:

- Added a section discussing the result of camera surveys completed by DEC & Cornell University (Twining et al. 2024) under the "Status" section of the Plan.
- Added additional information on a bobcat research project being undertaken by DEC and Cornell University under *Strategy 1.1.3.2.*
- Updated all harvest and observation data to include the 2021–2022 and 2022–2023 seasons.

Responses to comments received by the public are grouped and addressed by theme:

Theme: The data that DEC relied upon in this plan is unreliable and not based on good science.

Comment: Harvest-based data assume that harvest numbers are accurate, and they are not. A DEC sample of 70 carcasses showed that many bobcats were hunted or trapped and not reported.

Response: The use of harvest data to monitor wildlife populations is well established and is currently the most commonly used and relied upon approach for monitoring bobcat populations in North American (Roberts and Crimmins 2010). Bobcat harvests are very closely monitored by both New York and the U.S. Fish and Wildlife Service through the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) pelt sealing program. All harvested bobcats must be physically tagged by DEC staff with a pelt seal before they can be processed in any way (this includes being tanned or mounted). Bobcat pelts cannot be bought, sold, or exported without a seal. This regulation allows DEC to closely monitor the harvest and we are confident that most harvested animals are tagged and that harvest numbers are accurate.

One comment cited a DEC sample of 70 carcasses that shows that many were hunted and trapped and not reported. We assume that this comment is referring to the review of bobcats submitted to the Wildlife Health Program since 2013 that is discussed in the "Survival and Mortality" section of the Plan. This review found that 16% were animals that were hunted or trapped, and the remainder were collected via other sources of mortality (e.g., vehicle collisions). Although the initial wording was not clear, the 16% were all legally harvested bobcats. This has been clarified in the Plan.

Comment: Harvest and observation data used in the plan are unreliable, and better research has found that bobcat populations in New York are critically low (e.g., Twining et al. 2024).

Response: Harvest-independent metrics such as the occupancy modeling performed by Twining et al. (2024) are beneficial as they account for uncertainty in the observation process (i.e., the probability that a bobcat is present at a site but not observed). These estimates are important to consider, and the draft Plan has been updated to include the results, which were not completed at the time the initial draft was developed. This modeling estimated low bobcat occurrence across portions of central and western New York; however, caution should be used when interpreting these results. The study was designed for DEC to detect and estimate the density of fisher; bobcat detections were incidental and untargeted. Previous research has shown that cameras need to be left out for 7-8 weeks at a time to increase bobcat detection rates and precision of estimates (Clare et al. 2015); our fisher survey period was only 3 weeks long. In addition, our camera stations were baited sites located off-trail, which is not as effective for bobcats as cameras located along trails (e.g., Clare et al. 2015). Low detection rates can have a significant impact on the precision of occupancy estimates (Clare et al. 2015).

A key assumption of occupancy models is that the occurrence of a species is explained by measurable habitat variables. While habitat certainly impacts species distribution, the relation is often more complicated. Until recent decades, bobcats were relatively rare in large swaths of central and western New York. Observation reports in the “Population Growth Area” (defined in the plan) continue to increase, indicating that bobcat populations may still be establishing and increasing in some areas. This uneven distribution of animals across the landscape can bias estimates.

DEC agrees that harvest and observation data have limitations. These data are dependent on participation, which varies due to a number of different factors. Estimating harvest density and take-per-unit-effort addresses some of these concerns by standardizing land area and harvest effort, respectively; however, these metrics are still limited by the assumption that harvest numbers are proportional to abundance, which is not always true (Maunder et al. 2016). On the other hand, harvest data has been collected for decades, providing a valuable long-term dataset that spans a large spatial area. Since both harvest-dependent and harvest-independent data have limitations, DEC relies on a combination of metrics to make management decisions whenever possible, as outlined in the management plan.

Comment: Traps-per-unit-effort is a theory that has no value because it is impacted by too many variables (trapper abilities, incidental catches, weather, habitat variations).

Response: We assume that this comment is referring to take-per-unit-effort (TPUE). The utility of using TPUE to monitor changes in furbearer populations is well documented (see White et al. 2015; Hiller et al. 2021 for examples). The benefit of using this metric is that it accounts for sources of variation in harvest (e.g., changes in trapping pressure due to pelt prices, weather, costs) by normalizing harvest by effort expended. For trapping, TPUE is the product of traps set and the number of nights these traps are set (expressed as the number of bobcat harvested per 100 trap-nights). Normalizing harvest data by effort facilitates year-to-year comparisons and addresses changes in effort and resulting harvest. In addition, TPUE provides reliable trend information at the temporal and geographic scale for which it is used because it focuses on the average success of all trappers, smoothing out variation that occurs by individuals.

Comment: How can DEC conclude that the bobcat population in the Adirondacks is robust when this area has the lowest sighting rate in the State?

Response: The lack of bobcat observations in the Adirondacks is unsurprising and expected given the remoteness of the area with fewer trappers and bowhunters spread out over a large landscape. Because of variable participation, assessment of observation or harvest trend data should be conducted within but not among Wildlife Management Unit Aggregates. The Adirondacks have supported a bobcat harvest for decades, and harvest rates have been stable.

Comment: DEC has no credible statewide estimate of what the bobcat population is, it may be robust or hanging on by a thread.

Response: An accurate measure of population size is not required for proper management of most species, including bobcats. Instead, wildlife management typically focuses on monitoring population trends over time, which is a more useful metric for monitoring populations. All data in the draft Plan focus on the trend of bobcats in New York, most of which indicate a stable population.

DEC and Cornell University are in the middle of a targeted study that will estimate bobcat density in portions of New York. This study will provide additional information on the State's bobcat population (see below for additional details).

Comment: The extended bobcat season in the Northern Zone is cited as an accomplishment, but this conclusion is based on a survey of 4,500 trappers and furbearer hunters to evaluate season date preferences for bobcats and other furbearers.

Response: The purpose of the cited survey was not to evaluate the extended season in the Northern Zone, but instead to provide information on what furbearer trappers and hunters valued.

The 2012–2017 Plan moved the trapping season end date from December 10th to February 15th in the Northern Zone to coincide with the existing hunting season. In addition, the Plan aligned season dates in the Tug Hill WMU aggregate to align with the rest of the Northern Zone. DEC estimated that this would result in minimal additional take (less than 50 bobcats a year). In the 10 years since the season date change, the additional harvest has averaged approximately 40 bobcats a year, below what was estimated in the 2012–2017 Plan.

Theme: DEC needs to conduct a more adequate study on bobcats in New York to have a better understanding of their population.

Comment: DEC should invest in harvest-independent surveys. Significant use of radio collars could enable tracking the existing population. Trail cameras could also be set up and monitored.

Response: DEC has partnered with Cornell University and is in the middle of a targeted bobcat study to estimate bobcat density in New York. Cornell University is working with trappers and DEC staff to live-capture bobcats and outfit them with GPS collars. Data from the collared animals will be used in conjunction with results from a large-scale camera survey to estimate bobcat density at several study areas across New York. We added additional information on the goals and methods of this study to the Plan. This project is discussed under *Strategy 1.1.3* in the Plan.

Comment: DEC should not be making management decisions about harvest seasons while also setting the objective of determining the status, distribution, and population trends of bobcats in New York.

Response: Wildlife populations are fluid, and proper management depends on continuing to evaluate their status and trends over time, both before and after taking a management action. However, this does not preclude the ability to make management decisions. Continuing to monitor population trends and status allows for more informed decision-making, as well as the ability to monitor the response of the population to any management changes.

The draft Plan does not make recommendations for any changes to the bobcat harvest season. Instead, the objectives include evaluating existing harvest regulations by comparing harvest trends to population trends estimated from research and establishing criteria to guide future recommendations.

Comment: DEC staff should systematically report bobcat sightings and should solicit observations from the public.

Response: DEC maintains an online Furbearer Sighting Survey. Members of the public who observe a bobcat or other furbearer of interest (fisher, otter, gray fox, or weasel) are encouraged to report their sightings using this survey. The survey allows users to submit a photograph of the animal, from which DEC can verify sightings. DEC staff also use this survey to record their own observations of bobcats and other species. This survey is discussed under *Strategy 1.1.2* in the Plan.

Comment: Why is there a need to collect more population data when observation and harvest data has worked well so far, and bobcat populations appear to be doing well?

Response: DEC agrees that observation and harvest data are valuable datasets that have been used to effectively manage many species, including bobcats, over the years. However, collecting additional, harvest-independent data helps improve confidence in bobcat population status and trends, particularly in areas that are closed to harvest. DEC is committed to using the best available science to inform the development of science-based management recommendations.

Theme: Bobcat population in New York is perceived to be not doing well, and harvest regulations should be modified to reflect that.

Comment: If bobcat populations are lower now than in the 1970s, we should reduce harvest opportunity for the current harvest area and not open new areas.

Response: All data suggest that the bobcat population is significantly higher now than in the 1970s. During the 1970s and 80s, the estimated statewide population was 800-1,100 adult bobcats (Fox 1990) and harvests were between 100–200 animals. At that time, bobcats could primarily be found in only three parts of the State: the Adirondacks, the Taconics, and the Catskills. Since then, bobcat populations have expanded dramatically and bobcats are now found throughout New York, with the exception of Long Island.

Comment: Until additional research on bobcats is completed, there should be a pause on bobcat hunting and trapping.

Response: DEC does not believe that such an action is warranted currently. Harvest metrics, demographic modeling, and observation data all suggest that bobcat populations in New York are doing well. Thus, DEC does not believe a pause on bobcat hunting and trapping is warranted at this time. Bobcat occupancy as documented by Twining et al. (2024) was low in central and western New York, but because the analysis did not use data collected from a survey designed to study bobcats, it is not known if this is an accurate measure of bobcat occupancy or simply a result of the study design. The ongoing DEC/Cornell University bobcat project will provide valuable information on bobcat populations across the State. Those results will be critical when making future management recommendations.

Comment: DEC data show that in areas where hunting and trapping are allowed, harvest success rates have declined (Fig. 9), observations have declined (Fig. 12) and harvests have declined (Fig. 13). This is not stability.

Response: Although harvest success increased in the southern portion of the Established Harvest Area (EHA) including the Northern Zone, there was a slight decline in the Southeastern Zone (Fig. 9). However, this decline is not statistically significant. Scientists rely on statistics to help separate out natural variation from true trends. Harvest success naturally varies based on many factors, including weather, environmental variables such as food availability that may make bobcats more or less susceptible to harvest, hunter/trapper skill, and more. This variability can lead to small increases or decreases annually. If the decline was statistically significant, it would indicate that the decline was larger than expected from natural variation and more likely to be a result of a decline in the bobcat population. As this decline was not statistically significant, we cannot say that the decline was not simply a result of annual variation.

Similarly, the decline in observations from the EHA was not statistically significant (Fig. 12). The decline is not larger than would be expected from annual variation related to factors such as fewer participants, bad weather limiting ability to see animals, etc.

Harvest in the Harvest Expansion Area (HEA) has declined since the season was opened in 2013 (Fig. 13). This declining trend was only significant in two areas. The decline is primarily driven by large harvests in 2013, when fur prices coupled with the novelty of a new season fueled high hunter and trapper participation and effort and resulted in New York's largest bobcat harvest in over 20 years. Harvest success and take-per-unit effort are better metrics that account for variation in effort; both of those show a stable trend for the entirety of the HEA.

Comment: The female-biased sex ratio observed raises concern about overharvest.

Response: This is discussed in-depth in the Plan under Objective 1.2: Estimate population demographics and vital rates in harvested bobcat populations throughout New York. Female-biased sex ratios likely result from misidentification of bobcats by successful hunters and trappers. To better assess the sex ratio, DEC will collect bobcat carcasses for three seasons. In addition to conducting internal examinations to determine sex, DEC will collect and analyze bobcat reproductive tracts to determine litter size and reproductive rates throughout the state. These data on reproductive information will better inform population modeling.

Comment: There should be a bag limit on bobcats.

Response: DEC recognizes that the public may view unlimited bag limits negatively; however, the majority of hunters and trappers (76% over the past 5 years) only harvest one bobcat a

season, and 90% harvest no more than 2. Establishing a bag limit would have limited impact on the overall harvest. However, DEC would consider a bag limit if harvest patterns change and if reductions in bobcat harvest are necessary.

Comment: If the normal annual bobcat harvest is around 400, but 800 were killed in 2013, how does that show stability?

Response: 2013 was the first year of the limited harvest season in the HEA. The reason for this spike was high hunter and trapper participation and effort across the State. This was likely due to a combination of novelty of the new season and high pelt prices that year. Harvest success and take-per-unit-effort remained stable throughout this period. In subsequent years, effort declined, and the harvest stabilized. This highlights the importance of considering effort and not relying solely on harvest numbers.

Comment: Given that there is an international market for the furs of small wild cats similar to bobcats, another "spike" could foreseeably lead to rapid depopulation of NYS within the span of a few years. 800 represents nearly 20% of the population of 5,000 bobcats.

Response: The "spike" in harvest in 2013 was a response to the combination of the new regulated season opened in the HEA and high pelt prices of all furbearers. The increase in effort was short-lived and harvest quickly stabilized at levels similar to those that occurred before the spike. It should be noted that the 5,000 bobcat estimate was from the previous Plan, and was based on harvest rates. We expect to get a more robust estimate of bobcat density from the current research being undertaken by DEC and Cornell University and will re-evaluate harvest impacts at that time. However, research on bobcats indicates little impact of harvest on population size until harvest exceeds 20% of the population (Knick 1990).

Because of the similarity of bobcats to other small, endangered wild cats, bobcats are listed under Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). One of the requirements of the CITES listing is that the USFWS must complete a non-detriment finding every 5 years. This finding must prove that the exportation of bobcats taken during regulated seasons in the U.S. will not be detrimental to the survival of the species. The current non-detriment finding runs from 2020–21 through 2025–26, after which this finding will be updated. The finding includes an evaluation of bobcat harvest throughout the U.S.

Comment: New York's bobcat season is too long. It should be more like Vermont and Pennsylvania's seasons. Night-hunting also should not be allowed.

Response: Currently, the majority of DEC's data sources suggest a stable bobcat population. The season length in the EHA has been consistent for decades (except for the trapping season in the Northern Zone and the Tug Hill, which were changed in 2013), and harvest success rates and take-per-unit-effort have been stable. If DEC gets additional data that suggest that the harvest season may be negatively impacting the bobcat population, we will re-evaluate our harvest seasons appropriately.

Night hunting is a safe and effective technique for harvesting several furbearer species. If new data suggests that this activity may be threatening the bobcat population or poses safety concerns, we will re-evaluate it.

Comment: Bobcats should only be harvested if they are abundant.

Response: Abundance varies widely for different species. Bobcats are an elusive, solitary species that occur at low densities across the landscape. Because of this, even a healthy bobcat population will never be abundant on the same level as other game species like white-tailed deer. However, most of our data on bobcat populations suggest that the species is common and doing well in New York. One study (Twining et al. 2024) did find low occurrence rates of bobcats in central and western New York. To get a better idea of bobcat population status and trends, we are carrying out a research project focused on estimating bobcat density across portions of central and western New York. DEC plans on re-evaluating bobcat harvest seasons once we have the results from that project.

It should be noted that bobcat hunting and trapping are highly regulated. Every animal must be physically sealed by DEC personnel, allowing us to closely track the harvest. Regulated hunting and trapping does not cause species to be endangered, and scientifically-based management allows for healthy populations of bobcats and other harvested species.

Theme: The draft Plan focuses too much on one user group.

Comment: DEC should survey all New Yorkers about how they regard hunting and trapping of these animals and the fact that there are no bag limits.

Response: *Strategy 3.2.1* in the Plan calls for assessing public values and attitudes concerning furbearer management, including bobcats, and harvest management. Survey work by Responsive Management (2019) found that 80% of Americans approve of legal hunting, and the level of approval has remained generally consistent over the past quarter century. A majority of Americans (52%) approved of trapping and there is relatively high approval of trapping for wildlife restoration, population control, food, and property protection (Responsive Management 2019).

Comment: DEC should consult more with trappers, who are knowledgeable and can be of great assistance to the Department.

Response: Trappers have been a valuable resource for DEC. In the past, we have relied on trappers to provide biological samples, complete activity logs documenting effort, and to assist in various research projects. DEC and Cornell University have partnered with trappers for assistance with the ongoing bobcat research project. Our cooperating trappers live captured bobcats which were then outfitted with GPS-collars. The data collected from these collared bobcats will be critical in estimating bobcat density. DEC plans to continue this work next fall. In addition, DEC surveys 4,500 trappers annually to assess participation, effort, harvest, and routinely includes questions about furbearer observations and other aspects of furbearer management.

Comment: The Plan should have a better description of why trapping and hunting bobcats is a necessary use that overrides the need for conservation.

Response: Conservation and hunting and trapping are not mutually exclusive. In fact, consumptive use has a foundation in the central tenets of the North American Model of Wildlife Conservation – wildlife is a public trust resource and may be sustainably used for legitimate purposes, including food and fur. In addition, New York's Environmental Conservation Law (ECL), as established by the New York State Legislature, specifically authorizes trapping and hunting of animals as a legitimate use of our wildlife resources.

Theme: The current seasons are too conservative. DEC should expand hunting and trapping opportunity before 2033.

Comment: Wildlife management decisions should be based on science-based decisions, not emotions.

Response: As mentioned in responses to previous comments, DEC is committed to following the tenets of the North American Model of Wildlife Conservation, which includes principle that science is the proper tool to discharge wildlife management. This is why the Plan does not make immediate recommendations for changes to harvest seasons. Instead, DEC plans on completing the focused bobcat study and using the results to guide future management.

Comment: The harvest season in the HEA should be after the close of big game seasons, as the fur is in much better shape at that time.

Response: In 2017, DEC worked with the Joint Trapping Initiative, a branch of the NYS Trapper's Association, to develop a survey evaluating season timing preferences of trappers and furbearer hunters. The majority of respondents indicated that October 25th was the preferred season opening date for bobcats. This preference was especially pronounced in bobcat hunters, of which around 50% indicated that they preferred the current season start date.

As outlined in *Strategy 2.1.1.*, DEC will continue to evaluate trapper and hunter preferences related to season timing to inform future management decisions.

Comment: DEC should get aggressive with opening new areas to a bobcat harvest. DEC can work with trappers to collect data during the season and accelerate the research.

Response: DEC is in the middle of a bobcat research study with the goal of estimating bobcat density at several study areas across New York, including areas bordering the current HEA where bobcat observations are high. When that study is completed, we will evaluate the results and make recommendations on harvest seasons – these may include changes to existing seasons or potentially expanding opportunity to new areas where the population indicates a limited harvest could be sustained.

Trappers continue to be an important resource to DEC. If there is a need for additional harvest-dependent data, such as tracking effort in certain areas, we will work cooperatively with trappers to collect that information.

Theme: Trapping of bobcats and other species is cruel, inhumane, and should be stopped.

Trapping is a highly regulated activity that is used as a tool to manage wildlife and their habitats. In addition to sustainable use, trapping provides benefits such as protecting endangered species during vulnerable life-cycle periods (e.g., island and ground nesting birds that are vulnerable to predation), reintroducing populations (e.g., river otters), scientifically monitoring animal population size and health, providing relief to the public from property damage, protecting public health and safety (e.g., flooding from beavers), and ensuring that resources are used responsibly.

In 1997, the Association of Fish & Wildlife Agencies created the Best Management Practices for Trapping Program (BMPs) to improve regulated trapping by evaluating trapping devices and methods. To be approved, a device must meet international standards designed to ensure

animals are humanely captured. DEC has been involved in BMP research and encourages the use of BMP-approved traps.

Comment: The current bobcat harvest season promotes killing bobcats with young. DEC should consider reproduction and the fact that bobcats sometimes stay with their mother through winter.

Response: Although bobcats may reproduce throughout the year, most kittens are born in April and May. The current seasons are designed to avoid this reproductive period. Although young-of-the-year may remain with their mother through the winter, they are able to survive on their own by fall. The current season ensures minimal impact to mothers and young by avoiding the period when kittens are dependent on the mother.

Comment: The New York bobcat season that runs into late winter is cruel. The New York season should be more similar to seasons in Vermont and Pennsylvania.

Response: The Vermont bobcat season runs from January 10th – February 7th, while the Pennsylvania season runs from January 11th – February 5th. These end dates are comparable to the New York season in the EHA, which ends February 15th. The majority (70%) of the harvest in New York occurs within the months of November and December.

Comment: Pelt sealing should not be done. There are better ways to monitor the bobcat population without killing them.

Response: Pelt sealing is a mandatory component of any bobcat harvest opportunity at the state and federal level. By having DEC staff seal every bobcat, we can closely monitor the harvest. This harvest information can be used in conjunction with population trend data to evaluate the impact of harvest.

Comment: Hunting with hounds is nonselective and cruel.

Response: When hunting bobcats with hounds, the dogs will typically tree the bobcat. This allows the hunter to make a decision whether they want to harvest the bobcat. It is not unusual for hunters to choose not to harvest an animal based on age or size. Since hunters can see the animals first and evaluate the situation, this type of hunting tends to be very selective.

Comment: Killing contests threaten bobcat populations.

Response: In December 2023, Governor Hochul signed legislation that outlawed certain hunting contests, competitions, tournaments, and derbies, including any contests that would have involved bobcat harvest.

Theme: Suitable habitat for bobcats.

Comment: DEC should provide information on how to create bobcat habitat on private property.

Response: Bobcats are habitat generalists and occupy a wide range of habitats in New York. In general, habitat that supports a healthy prey base (rabbits and other small mammals) is also beneficial for bobcats.

Comment: We would have a larger bobcat population if we managed the Adirondacks to support more early-successional habitat.

Response: Mature forests like much of the Adirondack Park typically do not support large prey populations for bobcats, and thus population density is generally not as high. In New Hampshire, researchers found that bobcats populations grew rapidly after abandoned agricultural lands grew into early successional habitats during the first half of the 20th century. As those forests matured, bobcat populations in the state declined (Litvaitis et al. 2006). The creation of additional early-successional habitat may benefit bobcat populations.

However, Article XIV of the State Constitution established the Forest Preserve in New York and all Forest Preserve lands shall be held "forever wild." This article limits DEC's habitat management on State lands within the Adirondack Park, so management must be based with that constraint in mind.

Comment: The definition of suitable habitat for bobcats should be expanded to include historical suitable habitat.

Response: As habitat generalists, most areas in New York are considered suitable habitat for bobcats (see Figure 2 in the Plan). In general, the only areas not considered suitable habitat for bobcats are heavily urbanized areas. It is unlikely that these areas will be converted back to natural landscapes.

Theme: Suggestions on Plan format and structure.

Comment: Regulations should be revisited sooner than 10 years from the passing of the Plan.

Response: The intent of the Plan was not to continue status quo for 10 years. Rather, the Plan serves as an update to the expired 2012–2017 Bobcat Management Plan and lays out the framework for future management decisions, which will be revisited as needed.

Comment: There should be a distinct timeline for all objectives in the Plan.

Response: Many of the objectives in the Plan are ongoing and will be continued annually (e.g., monitoring harvest). We chose not to add distinct timelines to other objectives, as it is not unusual for projects to get delayed or situations to change (e.g., changes in personnel or funding, etc.). However, we hope to have completed the strategies outlined in the Plan before its expiration.

Comment: The Plan is boilerplate and much of the information is copied and pasted from the previous Plan.

Response: The draft Plan serves as an update to the 2012–2017 Bobcat Management Plan. Because it is an update, there are some sections that are similar to the original Plan. For example, bobcat biology has not changed since 2012, and so much of that information is the same. However, the entire 'Current Status of Bobcats in New York' section has been updated with recent data, and the objectives and strategies reflect our current understanding of bobcats in New York.

DEC has made an effort to standardize management plan formats in recent years, to ensure that they all include biology and ecology, an assessment of the species status in New York, and goals, objectives, and strategies for that species.

Miscellaneous Comments:

The following comments do not fit into a theme addressed above.

Comment: Ten years between management plans is too long to make no changes to bobcat management in New York.

Response: This management plan serves as a framework to guide bobcat management over the next 10 years. Changes to regulations regarding bobcat harvest can occur at any time and do not have to wait for the next management plan. The current research projects will inform future management. If results indicate that changes in regulations are needed, DEC will pursue those changes as soon as possible.

Comment: A larger bobcat population in the Adirondacks would help reduce the deer population and increase forest vitality.

Response: Bobcats are one of many mammalian predators that exist on the landscape across New York State, along with coyotes, fox, fisher, marten, raccoon, and others. In New York, bobcats are considered a generalist and opportunistic predator, meaning that they have a diverse and variable prey base. Rabbits, hares, and other mammals make up a large proportion of their prey base. Bobcats occur at low densities throughout their range. Because of this, they generally do not effectively "control" or limit any prey populations.

Comment: The fact that bobcats in the Adirondacks have larger home ranges indicates that there is room for population growth.

Response: It is possible that low population density has some impact in the home range size of bobcats in the Adirondacks. However, research in New Hampshire found that bobcat home range size was primarily explained by food availability. Mature forests such as those found throughout the Adirondack Park typically have lower prey populations, meaning that bobcats may have to travel larger distances to feed.

Comment: Objective 2 should also consider sightings of bobcats on trail cameras and while enjoying outdoor recreation.

Response: Sightings of bobcats on trail cameras and while enjoying outdoor recreation are addressed with *Strategy 1.1.2* under Objective 1.1. In general, we expect that bobcat observations will increase with an increasing population, and so we feel that this strategy is better suited to the first objective.

Comment: DEC should provide guidance on sexing bobcats and put it in the annual Hunting & Trapping Regulations Guide.

Response: Appendix IV provides an informative guide on sexing bobcats and other furbearers. We will pursue the possibility of including this guidance in the annual Hunting & Trapping Regulations Guide or by delivering it to hunters and trappers in another format.

Comment: Surveys should be sent to every licensed trapper and the wording should be produced by DEC and the NYS Trappers Association, not Cornell University.

Response: The annual Trapper Mail Survey is sent to a random sample of 4,500 trappers, which is about one third of all licensed trappers. Sending a mail survey to all licensed trappers is cost-

and effort-prohibitive, and not statistically necessary. This sample size is representative of the population of New York trappers.

DEC works closely with the Cornell Center for Social Sciences (CCSS) with all our trapper surveys. The staff at CCSS are experts in creating surveys and wording questions effectively and in an unbiased manner. DEC will continue to use their expertise in the development of future surveys.

Comment: DEC should invest more in solving nuisance issues and co-existence with bobcats and other wildlife.

Response: Negative bobcat-human interactions are rare in New York. Strategy 3.3.2 discusses the development of guidelines and staff responses to negative bobcat-human interactions. DEC also has ongoing projects committed to co-existence with various species of wildlife; however, those projects are outside of the scope of this Plan.

Comment: Hunters and trappers should not have to jump through hoops or get any extra permits or logs mandated by the Department.

Response: We recognize that trappers are often asked to provide data to DEC by getting permits or completing activity logs and that these activities are time consuming. However, data from these sources have been critical for monitoring harvest and effort when new seasons are opened and ensuring sustainable use. At this time, we are not asking hunters or trappers to do anything extra for bobcats.

Comment: There should be a survey of all hunters in New York that asks for observations of bobcats and other species.

Response: New York has over 550,000 licensed hunters, making the development of such a large-scale survey difficult. However, we will take this comment into consideration and may consider it if warranted. For now, we encourage hunters to submit observations of bobcats via the Furbearer Sighting Survey, and for hunters and trappers that receive the Bowhunter Sighting Log and Trapper Mail Survey to log observations of bobcats.

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